

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

THE ESTATE OF LALIAH SWAYZER;
SHADÉ SWAYZER; DIANE RUFFIN; and
CHARLENE RUFFIN,

Case No.: 16-CV-1703

Plaintiffs,

v.

DAVID J. CLARKE JR.; KIMBERLY
WITKOWIAK; KEVIN UTSBY; KEZIAH
LOVE; T. CUNNINGHAM; JEFF
ANDRYKOWSKI; PAUL HEIN;
MILWAUKEE COUNTY; WISCONSIN
COUNTY MUTUAL INSURANCE
CORPORATION; ARMOR CORRECTIONAL
HEALTH SERVICES, INC.; DR. MAUREEN
WHITE; DR. RONQUILLO-HORTON; N.P.
KATHERINE MEINE; DR. GINA NEGRETTE;
R.N. FREDRICK PORLUCAS; DR. TULAY
GULSEN; and EVANSTON INSURANCE
COMPANY,

Defendants.

**MOTION TO FILE UNDER SEAL EXHIBIT C TO THE DECLARATION OF
MICHAEL P. RUSSART**

NOW COMES the Defendant R.N. Fredrick Porlucas, by and through his attorneys, Hinshaw & Culbertson LLP, and hereby moves the Court for an order to permit the sealing of the Exhibit C attached to the Declaration of Michael P. Russart.

AS GROUNDS THEREFORE, Defendant R.N. Fredrick Porlucas states the following:

This Motion relates to Exhibit C attached to the Declaration of Michael P. Russart which is included with Defendant R.N. Fredrick Porlucas Motion for Summary Judgment filings and the defendants' interest in protecting confidential information. Defendants David J. Clarke, Jr., Richard E. Schmidt, C.O. Love, C.O. Brooks, and Milwaukee County ("County Defendants")

produced documents in this matter, which are attached to the Declaration of Michael P. Russart as Exhibit C, and County Defendants designated those documents as “confidential.” Exhibit C includes confidential investigative materials prepared by the Milwaukee County Sheriff’s Department and jail log activity records. Defendant R.N. Fredrick Porlucas seeks to comply with this Court’s July 11, 2017 Order granting a protective order and in strict compliance with the procedures set forth in General L. R. 79(d) Defendant R.N. Fredrick Porlucas supports the continued sealing of the documents and materials.

Dated this 28th day of December, 2017.

/s/ Michael P. Russart

Michael P. Russart

State Bar No. 1023128

Jill M. Munson

State Bar No. 1019540

Attorneys for Defendants Armor Correctional Health Services, Inc.; Dr. Maureen White; Dr. Ronquillo-Horton; N.P. Katherine Meine; Dr. Gina Negrette; R.N. Fredrick Porlucas; Dr. Tulay Gulsen; and Evanston Insurance Company

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